

Robocall Mitigation Plan

Company: VOXCALLS LLC

Business Address: 347 5TH Ave, Suite 1208, New York, NY 10016

Effective Date: 6/30/2026

Version: 2.0

Purpose

This Robocall Mitigation Plan describes the policies and procedures implemented by VOXCALLS LLC to prevent the origination, transmission, and facilitation of illegal robocalls over its voice services. The Company is committed to complying with applicable Federal Communications Commission (FCC) regulations, industry best practices, and all applicable federal and state laws governing telecommunications.

Company Overview

VOXCALLS LLC is a small, interconnected VoIP reseller providing business voice services to commercial customers. The Company does not operate its own switching infrastructure and relies on upstream voice carriers for PSTN connectivity, SIP trunking, and telephone number resources.

Customer Verification

Before activating voice services, the Company performs reasonable due diligence including:

- Verification of business identity.
- Collection of government-issued identification when appropriate.
- Verification of business registration for commercial customers.
- Validation of contact information.
- Review of intended use of services.
- Screening against known fraud indicators.

Customers providing inaccurate, misleading, or unverifiable information may be denied service.

Acceptable Use Policy

Customers are prohibited from using Company services to:

- Transmit unlawful prerecorded or artificial voice calls.
- Deliver spoofed caller identification information.
- Conduct phishing, fraud, impersonation, or scam campaigns.
- Generate excessive high-volume automated traffic without prior authorization.

- Violate the Telephone Consumer Protection Act (TCPA), Truth in Caller ID Act, or applicable FCC regulations.

Violations may result in immediate suspension or termination.

Traffic Monitoring

The Company monitors voice traffic for indicators including:

- Unusually high call volumes.
- Short-duration call patterns.
- Sequential dialing behavior.
- High answer-seizure ratios.
- Customer complaints.
- Upstream carrier notifications.
- Industry traceback requests.

Traffic identified as suspicious is reviewed by Company personnel.

Traceback Cooperation

The Company agrees to cooperate promptly with legitimate traceback requests received through authorized industry organizations, upstream providers, or law enforcement agencies.

Upon receipt of a traceback request, the Company will:

- Identify the associated customer.
- Review call records.
- Contact the customer when appropriate.
- Preserve relevant records.
- Respond within requested timeframes whenever possible.

Know Your Customer (KYC)

The Company maintains customer records including:

- Legal business name
- Physical address
- Billing information
- Contact person
- Telephone numbers assigned
- Service activation records

Records are retained in accordance with applicable legal and business requirements.

Caller ID Authentication

When direct authentication is not available, the Company collaborates with upstream carriers that implement STIR/SHAKEN on eligible calls.

However, the company is currently in the process of becoming STIR/SHAKEN complaint and should be implemented by August 2026.

Mitigation Procedures

If illegal robocall activity is suspected, the Company may:

1. Contact the customer for explanation.
2. Temporarily suspend affected services.
3. Block outbound calling.
4. Terminate service.
5. Notify upstream carriers.
6. Cooperate with regulatory or law enforcement investigations.

Employee Responsibilities

Personnel responsible for voice services receive training regarding:

- Robocall mitigation procedures.
- Customer verification.
- Fraud detection.
- Escalation procedures.
- Regulatory compliance.

Complaint Handling

Complaints regarding suspected illegal robocalls are documented and investigated.

Each complaint receives:

- Date received
- Reporting party
- Telephone number involved
- Summary of allegation
- Investigation notes
- Resolution

Record Retention

The Company maintains records supporting this mitigation program, including:

- Customer onboarding documentation
- Service agreements
- Call detail records, where available
- Complaint logs
- Investigation records
- Traceback correspondence

Review

This Robocall Mitigation Plan is reviewed at least annually and updated whenever significant operational or regulatory changes occur.

Compliance Contact

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